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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION,)	
)	Case No: 17-cv-02000-APG-GWF
Plaintiff,)	
)	
v.)	STIPULATION OF ALL PARTIES TO
)	STAY CASE AND TOLL DEADLINES
REVMOUNTAIN, LLC, <i>et al.</i> ,)	PENDING COMMISSION'S AND
)	COURT'S REVIEW OF PROPOSED
Defendants.)	SETTLEMENTS
)	

Counsel for Plaintiff Federal Trade Commission ("FTC" or "Commission") and all Defendants have agreed on the terms of proposed settlements, subject to review and approval by the Commission. The FTC and Defendants stipulate herein to the entry of an order staying any further proceedings in this case and tolling all deadlines to allow the Commission to vote on the proposed settlements and, should the Commission vote in favor, to allow the Court to consider them. In support of this request, the FTC and Defendants state as follows:

Defendants have signed proposed settlements – *i.e.*, Stipulated Permanent Injunctions and Other Equitable Relief – that FTC counsel plans to recommend to the Commission. The FTC is an independent federal agency. Therefore, FTC counsel does not have authority to file the proposed settlements until the Commission reviews and approves them. The Commission approval process takes some time, usually 60 to 90 days.

If the Commission approves the proposed settlements, FTC counsel promptly will file the proposed settlements with the Court. If the proposed settlements have not yet been filed with the Court by May 21, 2018, FTC counsel propose to advise the Court of the status of this case by filing a status report at that time. If any of the settlements are rejected by the Commission or otherwise break down, the FTC plans to file a motion to lift the stay and recalculate the tolled deadlines.

Respectfully submitted this 26th day of February, 2018.

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/s/ GIOVANNI RUSCITTI
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Attorney for Defendant Blair McNea and all
Corporate Defendants

/s/ RACHEL HIRSCH
RACHEL HIRSCH
Attorney for Defendant Danielle Foss

/s/ RICHARD NEWMAN
RICHARD NEWMAN
Attorney for Defendant Jennifer Johnson

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: _____

PROOF OF SERVICE

I hereby certify that I served the foregoing Stipulation of All Parties to Stay Case and Toll Deadlines Pending Commission's and Court's Review of Proposed Settlements on February 26, 2018, on counsel for all parties as follows via the CM/ECF filing system:

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